

**Hearing Date and Time: November 16, 2011 at 10:00 a.m. (Prevailing Eastern Time)**  
**Objection Date and Time: November 9, 2011 at 4:00 p.m. (Prevailing Eastern Time)**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: )  
 ) Chapter 11  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, )  
 ) Case No. 08-13555 (JMP)  
Debtors. ) (Jointly Administered)  
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**LIMITED OBJECTION AND JOINDER OF BNY MELLON CORPORATE TRUSTEE  
SERVICES LIMITED IN OBJECTION OF THE DANTE NOTEHOLDERS TO THE  
DEBTORS' ASSUMPTION OF CERTAIN DERIVATIVE CONTRACTS**

BNY Mellon Corporate Trustee Services Limited (“BNYM”), by its undersigned counsel, hereby files its Limited Objection and Joinder of BNY Mellon Corporate Trustee Services Limited in the Objection of the Dante Noteholders,<sup>1</sup> to the Debtors’ Assumption of Certain Derivative Contracts, and states as follows:

1. BNYM is successor trustee under a certain Principal Trust Deed, dated 10 October 2002, between Dante Finance Public Limited Company and J.P. Morgan Corporate

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<sup>1</sup> The “Dante Noteholders” are: Belmont Park Investments Pty Ltd; Ambulance Victoria; Fire and Emergency Services Superannuation Board; Belrefef Holdings Pty Ltd; Broken Hill City Council; City of Swan; Eurobodalla Shire Council; G & F Yukich Superannuation Pty Ltd; Gippsland Secured Investments Ltd; G.James Australia Pty Ltd; G.James Superannuation Pty Ltd; Gosford City Council; Guyra Shire Council; Indian Pacific Limited; Lifeplan Australia Friendly Society Limited; Newcastle City Council; Orient Holdings Pty Ltd; Panorama Ridge Pty Ltd; Parkes Shire Council; Sashimi Investments Pty Ltd; Southern Finance Limited; Statewide Secured Investments Ltd; The Cootharinga Society of North Queensland; and Wingecarribee Shire Council.

Trustee Services Limited (as amended and restated, the “Principal Trust Deed”) and certain Supplemental Trust Deeds entered into in accordance with the Principal Trust Deed (collectively, the “Trust Deed”), including those referenced specifically in the Dante Noteholders Objection (as defined below).<sup>2</sup>

2. On or about November 4, 2011, the Dante Noteholders filed their Limited Objection to the Debtors’ Assumption of Certain Derivative Contracts (the “Dante Objection”) [Docket No. 21633] in which they objected to assumption of certain derivative contracts.

3. At the direction of the Dante Noteholders given in accordance with the Trust Deed, the Trustee joins in the Dante Noteholders Objection and objects to confirmation of the Plan for the reasons set forth in the Dante Noteholders Objection and objects.

Dated: November 4, 2011  
New York, New York

Respectfully submitted,  
REED SMITH LLP

By: /s/ Michael J. Venditto  
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2 BNYM incorporates by reference the definitions used in the Dante Noteholders Objection.